

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: **Robert R. Leap** : Bankruptcy No. 18-70383-JAD
:
Debtor : Chapter 13
:
: Related to Document No. 48

RESPONSE TO RULE TO SHOW CAUSE

Now comes Debtor's Counsel, Attorney Richard G. Allen, with the response to the Order dated September 12th, 2019..

1. The petition in this case was filed on May 22nd, 2018 and it was completed on June 13th, 2018.
2. The first section 341 meeting of creditors was held on August 17th, 2018. The Debtor needed to file his 2015 federal tax return. The hearing was continued to December 6th, 2018 for the Debtor to file the tax return.
3. The December 6th hearing was continued to February 28th, 2019 to monitor payments and for Debtor's counsel to object to the mortgage lenders proof of claim.
4. The February 28th, 2019 hearing was continued to June 27th, 2019 to allow the objection to the mortgage lenders proof of claim to conclude.
5. The June 27th, 2019 hearing was continued to an August 29th, 2019 conciliation to monitor payments.
6. As a result, the Rule to Show Cause was issued by the Court.
7. Since the issuance of the Rule to Show Cause, the Debtor's family have begun to help and support him financially. On or about October 9th, 2019, a treasurers check was submitted to the Trustee's account in the amount of \$8,000.00. This should substantially catch up on plan payments, and the Debtor's family will be helping him in the future to maintain the future payments. A copy of the treasurers check is attached as an exhibit.
8. Therefore, the Debtor respectfully requests this Court allow the case to go forward, subject to any future confirmation orders or orders from this Court.

Dated:
October 11th, 2019

/s/ Richard G. Allen, Esquire

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